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ADMITTED IN N.Y. AND N.J.

March 14, 2014

VIA FAX - (212)-805-7927

Hon. Naomi Reice Buchwald
Courtroom: 21 A
United States Courthouse
500 Pearl Street
New York, New York 10007

RE: 13-CIV-4609 SEC v. Magdalena Tavella et. al.

Dear Judge Buchwald:

We have previously filed a notice of appearance in the above entitled case. At the time of filing the notice, we were informed by the clients that we were being retained. While we had not at that time received a formal signed retainer agreement, we credited their assurances and decided to inform the Court as a deadline was quickly approaching and an extension was undoubtedly necessary. In the weeks that followed, we incorrectly believed that the delay in receiving documents assigning us the Power of Attorney were simply delayed due to the fact that the clients are foreign residents. It now appears we were mistaken.

We sincerely apologize to the Court for any delay we have caused. We ask that the Court grant our request to withdraw as counsel. And we intend to be more cautious the next time a potential client requests our urgent help.

Thank you for your continuing courtesy in connection with this matter. If you have questions, please contact me at (212) 750-7800.

Very Truly Yours,


Marc Agnifilo Esq.